



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 29, 2020

By ECF

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: *American Civil Liberties Union Foundation v. United States Department of Justice* et al., No. 19 Civ. 5483 (MKV)

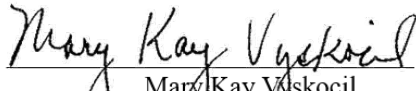
Dear Judge Vyskocil:

This Office represents the Government in the above-referenced case brought under the Freedom of Information Act ("FOIA"). I write respectfully on behalf of the parties to update the Court on the status of this case, as previously directed. *See* Dkt. No. 32. On March 31, 2020, the Government completed its processing and release of thousands of pages of records. The parties have been subsequently discussing in good faith Plaintiff's concerns about the Government's search and assertion of FOIA exemptions, in an effort to narrow the scope of, or avoid entirely, further litigation. While the parties have been working diligently, given the volume of records at issue, we respectfully request an additional 60 days to apprise the Court of either the resolution of this matter or the necessity of cross-motions for summary judgment. Should motion practice be required, the parties will proceed in compliance with Your Honor's individual practices concerning the filing of such motions.

We thank the Court for its consideration of this request.

Granted. SO ORDERED.

Date: 4/29/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

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cc: Counsel for Plaintiffs (by ECF)